

Ahren A. Tiller, Esq. [SBN 250608]  
ahren.tiller@blc-sd.com  
Brett F. Bodie, Esq. [SBN 264452]  
brett.bodie@blc-sd.com  
Donald W. Reid, Esq. [SBN 281743]  
don@blc-sd.com  
BLC LAW CENTER, APC  
1230 Columbia St., Suite 1100  
San Diego, CA 92101  
Telephone No. (619) 894-8831  
Facsimile No. (866) 444-7026

Attorneys for Creditors  
JAIME RODRIGUEZ, and  
ANA LIDIA GOMEZ

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION**

In re

THE ORIGINAL MOWBRAY'S TREE  
SERVICE, INC., a Delaware corporation

## Debtor and Debtor-in-Possession,

BK Case No.: 8:24-bk-12674-TA

Chapter 11

**OPPOSITION AND REQUEST FOR A  
HEARING ON MOTION FOR AN  
ORDER APPROVING EXPEDITED  
PROCEDURES FOR THE SALE OF DE  
MINIMIS ASSETS PURSUANT TO 11  
U.S.C. § 363**

1

2

3 Jaime Rodriguez and Ana Lidia Gomez (“Rodriguez/Gomez”) hereby and oppose the  
4 *Motion for an Order Approving Expedited Procedures for the Sale of De Minimis Assets Pursuant*  
5 *to 11 U.S.C. § 363 [Doc. 266] (“Motion”).*

6 On February 7, 2025, Rodriguez/Gomez filed a motion to appoint a chapter 11 trustee and  
7 substantively consolidate the Debtor’s bankruptcy estate with its affiliates, specifically Pino Tree  
8 Service, Inc., Mowbray Waterman Property, LLC, and Phoenix Traffic Management, Inc.  
9 (“Affiliates”). *See Doc. 286 (“Trustee/Consolidation Motion”).* For the reasons set forth in that  
10 motion, a chapter 11 trustee must be appointed due to the irreconcilable conflicts of interest of the  
11 Debtor’s management and their fraudulent transfer of millions of dollars to the Affiliates. Debtor  
12 should not be allowed to further dissipate the bankruptcy estate, especially through expedited sale  
13 procedures.

14 Accordingly, the Motion should be denied, and the Court should appoint a chapter 11 trustee  
15 and substantively consolidate the Debtor’s bankruptcy estate with the Affiliates as set forth in the  
16 Trustee/Consolidation Motion.

17

Dated: January 25, 2025

Submitted by:

/s/ Donald W. Reid, Esq.

Donald W. Reid, Esq.  
Bankruptcy Law Center, APC  
Attorneys for Plaintiffs

20

21

22

23

24

25

26

27

28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1230 Columbia St., Suite 1100, San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*): Opposition and Request for a Hearing on Motion for an Order Approving Expedited Procedures for the Sale of De Minimis Property Pursuant to 11 U.S.C. § 363 will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) February 7, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kenneth J Catanzarite kcatanzarite@catanzarite.com
- Marshall F Goldberg mgoldberg@glassgoldberg.com, jbailey@glassgoldberg.com
- Alan Craig Hochheiser ahighheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- Raffi Khatchadourian raffi@hemar-rousso.com
- Valery Loumber valloumlegal@gmail.com
- James MacLeod jmacleod@dunninglaw.com, nancy@dunninglaw.com
- Robert S Marticello rmarticello@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- David W. Meadows david@davidwmeadowslaw.com
- Queenie K Ng queenie.k.ng@usdoj.gov
- Estela O Pino epino@epinolaw.com, staff@epinolaw.com;clerk@epinolaw.com
- Amitkumar Sharma amit.sharma@aisinfo.com
- Thomas E Shuck tshuck@pmcos.com, efilings@pmcos.com
- Michael Simon msimon@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- Ahren A Tiller ahren.tiller@blc-sd.com, 4436097420@filings.docketbird.com;brett.bodie@blc-sd.com;anika@blc-sd.com;derek@blc-sd.com;kreyes@blc-sd.com;megan@blc-sd.com;nico@blc-sd.com;danny@blc-sd.com;angie@blc-sd.com;kreyes@blc-sd.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC\_KM\_ECF\_SMO@bclplaw.com,sharon-weiss-7104@ecf.pacerpro.com
- Mandy Youngblood csbk@gmfinancial.com
- Roye Zur rzur@elkinskalt.com, lwageman@elkinskalt.com;1648609420@filings.docketbird.com;rzur@ecf.courtdrive.com

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration

that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 7, 2025    Donald W. Reid  
*Date*                    *Printed Name*

/s/Donald W. Reid  
*Signature*